

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No.: 20-13812
	:	
Raymond Staley	:	
	:	
Debtor	:	Chapter 13

OBJECTION TO THE DEBTOR TO THE CERTIFICATE OF DEFAULT

1. Admitted.
2. Admitted.
3. Denied. In the alternative by or before the hearing on the instant Certification of Default the Debtor/Borrower will cure the post-petition default per the September 30, 2021 Order granting the Stipulation.
4. Denied.
5. Denied.

WHEREFORE, Debtor, respectfully request that this Court deny an Order Granting Relief from the Automatic Stay.

/s/Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street, #804  
The Philadelphia Building  
Philadelphia, PA 19107  
(215) 545-0008  
Attorney for Debtor

Dated: March 10, 2022